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Washington, DC 20405

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May 18, 1995

Mr. William F. Caton  
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1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Subject: Computer III Further Remand Proceedings:  
Bell Operating Company Provision of Enhanced  
Services. CC Docket No. 95-20

Dear Mr. Caton:

Enclosed please find the original and nine copies of the General Services Administration's Reply Comments for filing in the above-referenced proceeding. Copies of this filing have been served on all interested parties.

Sincerely,

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Assistant General Counsel  
Personal Property Division

Enclosures

cc: International Transcription Service  
Peggy Reitzel, Policy and Program Planning Division

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BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

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In the Matter of )  
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CC Docket No. 95-20

REPLY COMMENTS OF THE GENERAL SERVICES ADMINISTRATION

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May 18, 1995

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**REPLY COMMENTS OF THE GENERAL SERVICES ADMINISTRATION**

The General Services Administration ("GSA"), on behalf of the Federal Executive Agencies, hereby submits its Comments in response to the Commission's Notice of Proposed Rulemaking ("NPRM"), FCC 95-48, released February 21, 1995. This NPRM requests comments on structural separations of enhanced services provided by the Bell Operating Companies ("BOCs").

**I. INTRODUCTION**

Enhanced services extend the capabilities of the switched telecommunications network by providing voice mail, E-mail, voice store-and-forward, data processing, access to on-line databases, and other services for businesses, government agencies, and private individuals throughout the United States. The Commission distinguishes

enhanced services from "basic services" that are regulated under Title II of the Communications Act.<sup>1</sup>

Prior to the AT&T divestiture, the Commission ordered the Bell System to provide enhanced services through separate subsidiaries.<sup>2</sup> After divestiture, the Commission extended the requirement for separate subsidiaries to the seven RBOCs.<sup>3</sup> In Computer III, the Commission reversed this policy, stating that the requirement for BOCs to provide enhanced services through structurally separate subsidiaries should be replaced with non-structural safeguards.<sup>4</sup> The Commission indicated that structural separations might harm consumers by slowing or even preventing the development of enhanced services.<sup>5</sup>

Citing pleadings by the Association of Telemessaging Services International, the Newspaper Association of America and others, the Commission observes in its Notice of Proposed Rulemaking ("Notice") that various parties suggest requiring structural separations again.<sup>6</sup> The Commission is seeking comments and replies to investigate the matter in detail. Specifically, the Commission is asking parties to identify the benefits that will accrue with structural separations. It is also asking parties to explain why these benefits cannot be achieved by continuing non-structural safeguards.

Comments were filed by a diverse group of parties:

- the seven Regional Bell Operating Companies ("RBOCs");

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<sup>1</sup> See 47 C.F.R. para. 64.702(a).

<sup>2</sup> Final Decision, 77 FCC 2d at 275-86, paras. 233-60.

<sup>3</sup> CC Docket No. 83-115, Report and Order, 95 FCC 2d 1117, 1120, para. 3 (1984).

<sup>4</sup> CC Docket No. 95-20, Notice of Proposed Rulemaking, paras. 1-13.

<sup>5</sup> See, e.g., Phase I Order, 104 FCC 2d at 1008, paras. 89-94; BOC Safeguards Order, 6 FCC Rcd at 47-48, paras. 100-01.

<sup>6</sup> CC Docket No. 95-20, Notice of Proposed Rulemaking, para. 38.

- three interexchange carriers;
- seven enhanced service providers ("ESPs");
- two cable TV associations;
- two state commissions;
- the Ad Hoc Telecommunications Users Committee; and
- Hatfield Associates.

GSA did not submit initial comments, but elected to evaluate the positions of other parties and submit a reply if necessary. GSA has reviewed the comments filed on April 7, 1995, and offers the following views on this issue for the Commission's consideration.

## II. STRUCTURAL SEPARATIONS FOR ENHANCED SERVICES WOULD BE BENEFICIAL FOR CONSUMERS.

Structural separations for enhanced services are appropriate for the RBOCs. This framework should be required absent a specific showing, on a case-by-case basis, that structural separation of a specific activity would be demonstrably inefficient or patently harmful to consumers. In other words, structural separations should be the "default position" with waivers granted only if there is good cause.

GSA has changed its position on this issue. On March 8, 1991, GSA submitted comments in CC Docket No. 90-623. These comments stated, "As a major user of telecommunications throughout the nation, the GSA believes that structural separations are not needed and that effective non-structural means can be developed and employed as a preferable alternative."<sup>7</sup> GSA eschewed structural separations at that time because

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<sup>7</sup> CC Docket No. 90-623, "Comments of the General Services Administration," March 8, 1991, page 2.

it appeared that this practice would impose additional costs on ratepayers and Enhanced Service Providers ("ESPs").

On April 8, 1991, GSA submitted reply comments setting forth the same position. GSA noted two additional reasons why structural separations should not be adopted. First, the carriers must be able to offer enhanced services that are integrated into their basic networks. Second, structural separations would not resolve the cost allocation problems associated with integrated enhanced service systems.<sup>8</sup>

Because of the dramatic growth in competition and other changes in the telecommunications markets, GSA has reconsidered its views on the need for structural separations. Now, GSA is persuaded by the arguments and evidence submitted in the April 7 comments by those parties favoring structural separations. GSA agrees with AT&T's assessment:

Until the existing local exchange monopolies become competitive, imposition of unbundling requirements and structural separation are among the core conditions necessary [for competition] to develop, if it can, while assuring adequate safeguards for consumers.<sup>9</sup>

The years between 1991 and 1995 brought many changes in the telecommunications industry. With the diversification of RBOC activities in this period, structural separations are clearly required to ensure order in the regulatory process. GSA's prior concerns that structural separations would cause inefficiencies and hamper network integration have been addressed or eradicated with the passage of time. GSA is persuaded by the comments of interexchange carriers and end users that in this changed

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<sup>8</sup> CC Docket No. 90-623, "Reply Comments of the General Services Administration," April 8, 1991, pages 15-23.  
<sup>9</sup> "Comments of AT&T Corp.," April 7, 1995, pages 2-3.

environment structural separations will benefit consumers and aid the orderly development of competition.

### **III. STRUCTURAL SEPARATIONS ARE NECESSARY BECAUSE OF THE PROLIFERATION OF ACTIVITIES BY TELEPHONE COMPANIES.**

Non-regulated activities of the telephone companies now account for a significant share of their operations. This fact is illustrated by operating data for Bell Atlantic in the Commission's ARMIS Report for September 1994. Non-regulated activities accounted for 11.3 percent of revenues, 9.4 percent of operating expenses and 1.1 percent of plant investment for Bell Atlantic in the nine months ended September 30, 1994.<sup>10</sup>

Corporate organization charts for the RBOCs filed with the Commission pursuant to the Joint Cost Order dramatize the diversity of the operations of these corporate giants.<sup>11</sup> For example, the Ameritech "Bell Group" includes the five Ameritech operating companies that provide exchange and exchange access services in Illinois, Indiana, Michigan, Ohio and Wisconsin. The Ameritech Bell Group also includes several other active subsidiaries:

- Ameritech Services provides operational support, including information and communications systems, by performing functions on a centralized basis for other units of the firm.
- Champaign Telephone Co. sells and connects telephones and also provides other communications services (not acting as a local exchange carrier) in Champaign, Illinois. This firm is partly owned by The Ohio Bell Telephone Company.

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<sup>10</sup> F.C.C. ARMIS Report 43-01, September 30, 1994.  
<sup>11</sup> 2 F.C.C. Rcd at 1328.

- Illinois Bell Administration Center, Inc. controls a majority interest in a real estate partnership that owns an office building leased back to Illinois Bell and Ameritech Services.

These few examples show a fact that is obvious from the organization chart filed with the Commission. Subsidiaries now exist with complicated and interlocking relationships.

The scope of these organizations is only the tip of the iceberg. In addition to the organizations in the "Bell Group", Ameritech's overall organization chart displays more than fifteen "Other Business Operations." These include:

- Ameritech Advanced Data Services, incorporated in all five Ameritech states to provide business customers with advanced data communications services;
- Ameritech Credit Corporation, a provider of capital financing and leasing services;
- Ameritech Mobile Communications, providing wireless communications, including mobile telephone service, as well as paging products and services;
- MagyarCom, a consortium with interests in an entity that offers local, long distance and international telephone services in Hungary; and
- Starline Insurance Company, a reinsurance captive insurer for general liability, automobile liability and workers' compensation insurance coverage.

This pattern of diversification and multiple subsidiaries is not unique to Ameritech. NYNEX provided a list of "corporate affiliates" that fills three single spaced pages. All of the other RBOCs, as well as GTE, also have extremely diversified structures.

Certainly, no one could seriously argue that activities such as insurance and credit — logically separate from basic telephone services by any measure — could possibly be



integrated organizationally. These businesses are subject to Federal and state regulatory frameworks distinct from those established for telecommunications carriers. Structural separations of these activities is required for legal and practical reasons existing before and outside of the scope of this inquiry.

On the other hand, there are many RBOC activities that are closer to the telecommunications "mainstream." Examples of major activities in this group include:

- Commercial Mobile Radio Services,
- directory publishing,
- programming for video distribution, and
- international business ventures.

Activities of this type are sufficiently discrete to allow distinct organizations and management, but sufficiently close to the "basic" services provided by the companies to require "structural separation" as a protection to end users and other carriers.

Programming for video distribution is an example. The distribution of video programs using the switched network is a function that should logically remain integrated with basic services furnished by the BOCs. However, the BOC activity to produce the programs for dissemination on its network is clearly distinct from its main line of business. This activity can and should be structurally separated. If it is not separated, one company will have to perform two widely different functions rather than focusing on its core expertise.

#### **IV. NON-STRUCTURAL SAFEGUARDS HAVE PROVEN INADEQUATE TO PREVENT DISCRIMINATION.**

The Commission's Notice requested parties to describe the benefits that would not be achieved with non-structural safeguards. In response, GSA notes that the comments filed on April 7, 1995, provide ample evidence that the present system of non-structural safeguards has been inadequate to prevent discrimination.

For example, MCI Telecommunications explains in detail why the Commission's present accounting procedures and other rules have not been sufficient to control anticompetitive conduct by the BOCs.<sup>12</sup> MCI notes that cost allocation rules and other accounting regulations did not prevent a number of egregious cross-subsidies subsequently detected in an audit by the California Public Utilities Commission.<sup>13</sup> MCI observes that by requiring separate marketing personnel, structural separations inhibit misuse of customer information and improper "tying" of local exchange and enhanced services.<sup>14</sup>

Several years ago, GSA was convinced that structural safeguards might increase costs to the ESPs. Today, the ESPs are at the forefront in seeking structural separations for the BOCs in order to ensure a fair competitive market. For example, CompuServe argues forcefully that the present non-structural safeguards have permitted the BOCs to cross-subsidize their own enhanced service offerings with revenues from monopoly local exchange services and also permitted the BOCs to discriminate against their enhanced

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<sup>12</sup> "Comments of MCI Telecommunications Corporation," April 7, 1995, pages 28-48.

<sup>13</sup> *Id.*, pages 43-44.

<sup>14</sup> *Id.*, page 42.

service competitors.<sup>15</sup> CompuServe provides examples of cross-subsidization and discrimination.<sup>16</sup>

Both the Prodigy Services Company ("Prodigy") and The Information Technology Association of America note similar experiences with discriminatory practices. Prodigy cites assertions by the BOCs that there must be little discrimination because there have been few access-related complaints to the Commission.<sup>17</sup> Prodigy correctly notes that this claim is simply a "red herring," because of the jurisdictionally intrastate nature of most access disputes, the costs and difficulties of litigating at the FCC against a BOC with effectively unlimited resources, and the frustrations of ESPs who have found proceedings to be slow and ineffective in securing Open Network Architecture from the BOCs.<sup>18</sup>

The Information Technology Association of America ("Association") also reports that the Commission's Expanded Interconnection and Intelligent Networks proceedings have not prevented the BOCs from practicing access discrimination against competing ESPs.<sup>19</sup> The Association observes that experience subsequent to Computer III demonstrates that non-structural safeguards are not effective in preventing anticompetitive abuse.<sup>20</sup> The Association concludes that structural separation has lower costs than non-structural safeguards and that any benefits of integrated provisioning of enhanced services by the BOCs are minimal.<sup>21</sup> GSA agrees with the Association's conclusions.

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<sup>15</sup> "Comments of CompuServe Incorporated," April 7, 1995, pages 16-19.

<sup>16</sup> *Id.*, pages 27-49.

<sup>17</sup> "Comments of Prodigy Services Company," April 7, 1995, page 3.

<sup>18</sup> *Id.*, pages 3-4.

<sup>19</sup> *Id.*, pages 34-36.

<sup>20</sup> *Id.*, pages 43-53.

<sup>21</sup> *Id.*, pages 59-63.

**V. BOC ORGANIZATION STRUCTURES REQUIRE SEPARATIONS ABSENT A SPECIFIC WAIVER.**

There are two approaches to implementing a distinction between the activities that should be structurally separated and those for which this is not required. One approach is to assume *a priori* that organizational units should not be separated and examine each relationship individually to determine whether separation is required. The converse approach is to assume at the outset that all BOC organizational units should be structurally separated and require the BOC to justify any deviation from this practice.

GSA is convinced that the diversity of BOC activities and the overriding needs to protect consumers and promote the development of competition require the second course — waivers to avoid the requirement for separation. To ensure that these needs are met most efficiently, the Commission should consider factors such as the present (and likely future) size of the organizational activity and the ease with which that activity melds with the basic network transmission functions of the BOC. For example, all else being equal, the Commission would be expected to grant an exemption from structural separations more easily for a small activity than a large one, because the BOC would have fewer opportunities to exploit its strong market position or engage in cross subsidies. Also, all else being equal, the Commission would be expected to grant a waiver from structural separations if the activity meshed so closely with the principal activities of the BOC that separation would be clearly inefficient. However, in each case the burden would be on the BOC to show that the absence of separations would not significantly harm consumers or the competitive process.

VI. THE COSTS OF STRUCTURAL SEPARATIONS WOULD BE  
FAR LESS THAN PREVIOUSLY ANTICIPATED.

The costs of structural separations are far different now than when Computer III commenced in 1985. Costs now would be considerably less than previously anticipated because the companies have established many subsidiaries and should be continuing to establish more for other purposes.

The initial rationale for dropping structural separations rested heavily on the Commission's belief that it would impose substantial costs on the BOCs. As LDDS Communications points out, the Commission feared that if the companies were required to create additional subsidiaries simply for enhanced services, they would incur additional costs that would deter from them from developing and marketing enhanced services.<sup>22</sup>

Several years ago, GSA was also concerned that structural separations might place the additional burdens BOCs. However, the structure of the industry has changed dramatically, so that any required additional costs should not be substantial. LDDS notes:

It follows that the cost to the RBOCs of also providing enhanced services through these subsidiaries will be small if not trivial. ... Indeed, the new subsidiaries will become the RBOCs' primary retail arms, also purchasing the reselling local service obtained from their monopoly operating company. In any event, the RBOC will be free through the retail subsidiary to market enhanced and basic services together, addressing one of the Commission's original concerns with separations.<sup>23</sup>

GSA agrees with LDDS that structural separations requirements imposed by the Commission will cause few additional organizational changes.

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<sup>22</sup>

<sup>23</sup>

"Comments of LDDS Communications, Inc.," April 7, 1995, page I.  
*Id.*, page II.

In their April 7, 1995, comments, all seven RBOCs oppose mandatory structural separations. However, their objections that separations would be costly and cumbersome have no merit.

For example, Bell Atlantic states that the enhanced service market place has thrived since the Commission granted "structural relief."<sup>24</sup> The company goes on to explain that "fundamental unbundling" has already occurred.<sup>25</sup>

GSA agrees with Bell Atlantic's observations but not its conclusions. Indeed, enhanced services have thrived while the company's organizational structure has been unbundled. The company's "Chart of Affiliates" filed with the Commission for December 30, 1994, shows dozens of communications "affiliates" including Bell Atlantic Electronic Publishing, Bell Atlantic Ventures II, Bell Atlantic Mobile Systems, Bell Atlantic Business Systems, and Penn-Del Directory Company.

Regulatory, legal and operating considerations have dictated structural separations *de facto*. It is likely that specific considerations will also require separations of new business activities in the future. The ultimate choice should rest with the Commission by establishing a policy that requires structural separations unless a waiver is granted on the basis of the facts of the individual case.

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<sup>24</sup> "Comments of Bell Atlantic," April 7, 1995, page 4.

<sup>25</sup> *Id.*, page 20.

## VII. CONCLUSION

As the agency vested with the responsibility for acquiring telecommunications services on a competitive basis for use of the Federal Executive Agencies, GSA urges the Commission to adopt structural separations for enhanced services absent a specific showing on a case by case basis, that the procedure will be inefficient and harmful to consumers.

Respectfully submitted,

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May 18, 1995

CERTIFICATE OF SERVICE

I, Jay B. BURTON, do hereby certify that copies of the foregoing "Reply Comments of the General Services Administration" were served this 18th day of May, 1995, by hand delivery or postage paid to the following parties:

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